

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HANNAH YOUNG, ARIANA :
PALMACCIO, FIREARMS POLICY :
COALITION, INC., and NATIONAL :
RIFLE ASSOCIATION OF AMERICA, :
Plaintiffs, : **No. 3:24-cv-274**
: **Judge Stephanie L. Haines**
v. : **Electronically Filed Document**
JAMES OTT, BRIAN SZUMSKI, and :
COLONEL CHRISTOPHER PARIS, :
Defendants :

DEFENDANT PARIS' NOTICE OF DECISION

AND NOW, comes Defendant Colonel Christopher Paris, by his attorneys, Amelia J. Goodrich, Deputy Attorney General, and Nicole R. DiTomo, Chief Deputy Attorney General, Civil Litigation Section of the Pennsylvania Office of Attorney General, and files the following Notice pursuant to this Honorable Court's Orders at [ECF 43] staying all deadlines in that case and [ECF 46], and in support thereof provide as follows:

1. On February 26, 2025 the Third Circuit denied the petition for rehearing *en banc* and on March 6, 2025, the Third Circuit issued its Mandate as to the appeal filed in *Lara v. Commissioner, Pennsylvania State Police*, No. 21-1832 (“*Lara*”), holding that aspects of Pennsylvania’s Uniform Firearms Act violate the Second Amendment.

2. Defendant Paris is a party in *Lara*, and is strongly considering seeking certiorari in the Supreme Court of the United States in that matter.

3. Pursuant to U.S. Sup. Ct. R. 13.1, a party will have 90 days after entry of judgment to file a petition for a writ of certiorari to review a judgment in any case.

4. Thus, the parties in *Lara* have until May 27, 2025, to file a petition for writ for certiorari with the Supreme Court of the United States.

5. When certiorari was previously sought in *Lara*, that petition was granted. *Paris v. Lara*, 145 S.Ct. 369, 220 L. Ed.2d 137 (2024)(granting certiorari, vacating judgment, and remanding to the United States Court of Appeals for the Third Circuit for further consideration in light of *United States v. Rahimi*, 602. U.S. 680, 144 S.Ct. 1889, 291 L.Ed.2d 351 (2024)).

6. In the interest of judicial economy, Defendant Paris submits that the stay in the instant case should remain in place at least until the time for filing a petition for writ of certiorari has elapsed.

7. In the event that certiorari is sought, Defendant Paris submits that the instant case should remain stayed until *Lara* has been fully litigated and reaches a final conclusion.

WHEREFORE, the Defendant Paris submits that the stay should remain place until *Lara* is fully decided.

Respectfully submitted,

DAVID W. SUNDAY, JR.
Attorney General

By: s/ Amelia J. Goodrich

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Date: March 7, 2025

NICOLE R. DITOMO
Chief Deputy Attorney General
Civil Litigation Section

Counsel for Defendant Paris

CERTIFICATE OF SERVICE

I, Amelia J. Goodrich, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on March 7, 2025, I caused to be served a true and correct copy of the foregoing document titled DEFENDANT PARIS' NOTICE OF DECISION to the following:

VIA ELECTRONIC FILING

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s/ Amelia J. Goodrich
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